

July 13, 2022

**VIA EMAIL AND NCPC.GOV**

National Capital Planning Commission  
401 9th Street, NW  
Suite 500N  
Washington, DC 20004  
Attn: Elizabeth Miller  
Karin Schierhold

**Re: The Pennsylvania Avenue Initiative Proposed Vision – Comments from 1001 Pennsylvania Avenue and 1101 Pennsylvania Avenue Ownership**

Nuveen, LLC  
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Dear NCPC Physical Planning Division Staff:

On behalf of T-C 1101 Pennsylvania Avenue Owner LLC and the TREA 1001 Pennsylvania Avenue Trust (collectively, “**Owner**”), the owners of 1101 Pennsylvania Avenue, NW and 1001 Pennsylvania Avenue, NW, respectively, we are writing to share our comments to The Pennsylvania Avenue Initiative Proposed Vision (the “**Plan**”) published for public comment on February 16<sup>th</sup>. We own and manage two buildings along Pennsylvania Avenue—1001 Pennsylvania Avenue, NW and 1101 Pennsylvania Avenue, NW. Given our ownership of these properties, we are interested in the potential benefits of the Plan and want to flag certain broad goals and priorities for our property operations relative to the Plan.

We are excited about the prospect of enhancing the Pennsylvania Avenue experience and are hopeful that improvements, if done well, can create a positive impact for owners along the Avenue. We believe the Plan presents the opportunity to broadly address some of the current operational difficulties along the Avenue. In particular, we hope the Plan will:

- Include plans to improve the aging infrastructure along and under the Avenue, including inefficient and outdated utility pipes, equipment, and systems.
- Restructure and streamline the governance structure along the Avenue, including creating a centralized decision-maker and communicator for oversight, work, and approvals on the Avenue.
- Review and address operating issues globally along the Avenue for privately-owned buildings.
- Focus and center the Plan’s impact on existing operators and tenants along the Avenue, specifically the office sector, which is so prevalent along the Avenue and relies on the Avenue’s continued function and elements of its current character for its success.

In addition to these broad goals, we wanted to provide some specific priorities for us and where we see ways to improve on these priorities in the draft Plan. We believe the Plan priorities should be:

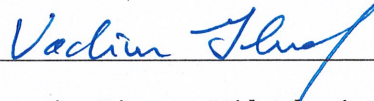
- Transportation Access. The Avenue is a vital corridor that serves the buildings along it and acts as a thoroughfare for all modes of transportation. While improving the transit, pedestrian, and bicycle infrastructure along the Avenue is helpful, it is vital that private vehicular access remain a key feature of the Avenue. As we are returning to the office, the importance of access options is even more essential and apparent than before the COVID-19 pandemic. Thus, retaining significant, robust vehicular access to office buildings flanking Pennsylvania Avenue should be **the key priority of the Plan**. Additionally, updated and ongoing traffic studies are needed to ensure the final Plan accurately provides sufficient transportation infrastructure and encourages active use of the area by office and retail tenants and their visitors or customers.
- Security. Security for buildings along the Avenue, as well as for those individuals visiting the Avenue, should be another priority of the Plan. This security focus should include preventing prolonged use of public space through tents or other semi-permanent structures that impede day-to-day tenant traffic or create an unsafe or unsanitary environment. It should also include improved communications along the Avenue among government agencies, adjacent tenants, owners, and other users, particularly when public events are occurring along or near the Avenue.
- Cost. The Plan anticipates major and costly improvements along the Avenue, all of which will also include ongoing maintenance needs. The full cost of such improvements and maintenance should be included as part of the Plan. There cannot be a shift of these costs to the building owners along the Avenue or the DowntownDC BID, in whole or in part.

While we understand all three concepts laid out in the Plan are in their early stages, the one most in line with our priorities is the Urban Capital concept. Specifically, the Urban Capital plan keeps transportation access along the Avenue, continues its function as a usable, accessible corridor serving buildings along the Avenue, allows for the Avenue to be an iconic connective piece between two key nodes of the Federal government, and provides refinement opportunities for its use. However, the Linear Green and Civic Stage would fundamentally harm the existing buildings along the Avenue and remove a valuable resource from these buildings. We hope the ultimate vision produced by NCPD for the Avenue continues to focus on the complete-street nature of the Urban Capital, which best serves the interests of the buildings along the Avenue and, therefore, the adjacent business community and City core itself.

In closing, we greatly appreciate the opportunity to provide our thoughts on the Plan, and we look forward to continuing to work with NCPC, directly and with the DowntownDC BID, as the Plan undergoes further study and refinement. We can be reached by phone at (202)378-1856 or email at [Vadim.Goland@nuveen.com](mailto:Vadim.Goland@nuveen.com) to discuss further.

Best Regards,

Vadim Goland



Managing Director, Mid-Atlantic

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